

**District Court  
Eastern District of Wisconsin**

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**Rabbi Alexander Milchtein and  
Ester Riva Milchtein,**

*Plaintiffs,*

*v.*

**Eloise Anderson, et al,**

*Defendants.*

**Civil Action No. 2:19-cv-01834**

**Plaintiff's Motion for Extension of Time**

On July 1, 2020, Defendant Bella's Group Home ("BGH") filed a Motion to Dismiss. The response to this motion is due July 22. Plaintiffs request a 21-day extension to respond to the motion—to and including to August 13, 2020. Defendant Bella's Group Home's counsel were contacted regarding this motion and they do not object.

Support for this motion is as follows:

1. In response to Plaintiff's complaint, each set of Defendants have filed a motion to dismiss Plaintiff's case based on several issues. Plaintiff has already filed a response to State Defendants' Motion to Dismiss on March 6, 2020, to County Defendants' Motion to Dismiss on April 30, and to the Hospital Defendants' Motion to Dismiss on May 8. Plaintiff must still respond to BGH's Motion to Dismiss.
2. The novel Covid-19 global pandemic has impacted the legal profession and has forced many to work from home for an extended period of time. With the withdrawal of Corrine Youngs,

Plaintiffs' counsel has had significantly less resources to devote to this matter, and therefore respectfully request a 21-day extension to respond to BGH's motion appropriately.

3. The Plaintiffs have not filed any prior motions for extensions of time for responding to BGH's Motion to Dismiss.
4. Defendants will not be prejudiced by the requested relief.
5. The motion was not made for the purposes of harassment or unnecessary delay.

Wherefore, Plaintiffs request a 21-day extension to respond to the motion—to and including to August 13, 2020, within which to file their response.

Dated: July 22, 2020

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Respectfully submitted,

/s/ Amanda Narog  
Amanda Narog